

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**DAVID K. VANCO, individually, and  
derivatively on behalf of CHICAGO  
FLAMEPROOF AND WOOD  
SPECIALTIES, CORP.,**

**Plaintiff,**

**V.**

**VINCENT MANCINI, MADDY  
ROSSOBILLO, individuals; CHICAGO  
FLAMEPROOF AND WOOD  
SPECIALTIES CORP., NORTHERN  
ILLINOIS LUMBER SPECIALTIES  
CORP. & MADISON  
MONTGOMERY, L.L.C.,**

**Defendants.**

**Case No. 19-cv-6132**

**Honorable Joan H. Lefkow**

## **CERTAIN DEFENDANTS' MOTION TO DISMISS**

Defendants Vincent Mancini and Maddy Rossobillo move this Honorable Court to dismiss Plaintiff David K. Vanco's second amended complaint. In support, Defendants file contemporaneously herewith and incorporate by reference herein their Memorandum of Law in Support of Their Motion to Dismiss.

WHEREFORE, Defendants Vincent Mancini and Maddy Rossobillo respectfully request that the Court enter an Order dismissing Plaintiff David K. Vanco's second amended complaint with prejudice, and for such other and further relief as the Court deems just and appropriate.

Respectfully submitted,

**VINCENT MANCINI**  
and **MADDY ROSSOBILLO**

By: /s/ Patrick G. Cooke  
One of their attorneys

Patrick G. Cooke, Esq. (ARDC #6229059)  
Edward J. Keating, Esq. (ARDC #6330220)  
Swanson, Martin & Bell, LLP  
330 North Wabash Avenue, Suite 3300  
Chicago, Illinois 60611  
(312) 321-9100  
(312) 321-0990 – Fax  
pcooke@smbtrials.com  
ekeating@smbtrials.com

**NOTICE OF FILING / CERTIFICATE OF SERVICE**

I hereby certify that on **July 2, 2020**, I electronically filed the foregoing with the Court using the CM/ECF filing system, which will automatically serve copies upon all counsel of record, including:

Timothy M. Johnston, Esq.  
Michael A. Goldberg, Esq.  
Robert J. Tomei, Jr., Esq.  
Johnston Tomei Lenczycki & Goldberg, LLC  
350 North Milwaukee Avenue, Suite 202  
Libertyville, Illinois 60048  
tim@lawjtlg.com  
mike@lawjtlg.com  
rob@lawjtlg.com

William J. Arendt, Esq.  
William J. Arendt & Associates, PC  
7035 Veterans Boulevard, Suite A  
Burr Ridge, Illinois 60527  
William.arendt@wjarendtlaw.com

Under penalties as provided by law, the undersigned certifies that the statements set forth herein are true and correct.

/s/ Patrick G. Cooke